

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION

NO. 4:16-CR-17-1H

FILED

FEB 23 2016

JULIE RICHARDS JOHNSON, CLERK
US DISTRICT COURT, EDNC
BY KMA DEP CLK

UNITED STATES OF AMERICA

v.

BENJAMIN F. STANCIL

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)
) CRIMINAL INFORMATION
)
)

The United States Attorney charges:

COUNTS ONE THROUGH FOUR

[Wire Fraud;
18 U.S.C. § 1343]

The Scheme to Defraud

From in or about October 2010, to in or about October 2012, in the Eastern District of North Carolina and elsewhere, the defendant, BENJAMIN F. STANCIL, knowingly, and with intent to defraud, devised and intended to devise, and participated in, a scheme and artifice to defraud the American Federation of Government Employees Local 451, as to a material matter and to obtain money and property by means of materially false and fraudulent pretenses, by utilizing a union issued Visa debit card for his personal use.

The Manner and Means of the Scheme

The defendant created and executed a scheme and artifice whereby he unlawfully acquired funds for his personal use, which were the

property of the American Federation of Government Employees Local 451, by the use of a union Visa debit card.

The Use of the Wires

On or about the dates listed below, in the Eastern District of North Carolina and elsewhere, for the purpose of executing the aforementioned scheme and artifice to defraud, the defendant, BENJAMIN F. STANCIL, knowingly transmitted and caused to be transmitted, in interstate and foreign commerce, by means of wire communications, certain writings, signs, and signals, that is, transmissions from within the Eastern District of North Carolina to servers located outside of North Carolina, as set forth in the counts below:

COUNT	DATE	WIRE COMMUNICATION
1	10/17/2011	Union Visa debit card purchase of food at Applebee's Restaurant in Raleigh, North Carolina
2	8/6/2012	Union Visa debit card purchase of an Apple iPad accessory at Best Buy in Morehead City, North Carolina
3	9/7/2012	Union Visa debit card purchase of a Blue Ray player and food at Wal-Mart in New Bern, North Carolina
4	10/9/2012	Union Visa debit card purchase of gasoline at Wilco in Williamston, North Carolina


Each entry in the above table constituting a separate violation of Title 18, United States Code, Section 1343.

FORFEITURE NOTICE

Upon conviction of the offense set forth in this Criminal Information, the defendant, BENJAMIN F. STANCIL, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) (as made applicable by 28 U.S.C. § 2461(c)), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation(s).

The forfeitable property includes, but is not limited to the gross proceeds of the offense described above in the approximate amount of thirteen thousand three hundred and eight dollars (\$13,308.00) in U.S. currency, for which a money judgment is sought.

JOHN STUART BRUCE
Acting United States Attorney

BY 
SEBASTIAN KIELMANOVICH
Assistant United States Attorney